



DIGITAL  
LIFE

RJIL/TRAI/2019-20/475  
27<sup>th</sup> November 2019

To,  
**Shri U.K. Srivastava**  
**Pr. Advisor (NSL)**  
**Telecom Regulatory Authority of India**  
**Mahanagar Doorsanchar Bhawan**  
**Jawaharlal Nehru Marg, New Delhi - 110002**

**Subject: RJIL's Counter Comments on TRAI's Consultation paper on 'Developing a unified numbering plan for fixed line and mobile services' dated 20<sup>th</sup> September 2019.**

Dear Sir,

Please find enclosed herewith RJIL's counter comments on the submissions made by other service providers to TRAI's Consultation paper on 'Developing a unified numbering plan for fixed line and mobile services' dated 20<sup>th</sup> September 2019.

Thanking you

Yours sincerely,  
For **Reliance Jio Infocomm Limited**,

  
**Kapoor Singh Guliani**  
Authorised Signatory



Enclosure: As above.

**RELIANCE JIO INFOCOMM LTD'S COUNTER COMMENTS ON TRAI'S CONSULTATION PAPER ON  
"DEVELOPING A UNIFIED NUMBERING PLAN FOR FIXED LINE AND MOBILE SERVICES"  
(Consultation Paper Dated 20<sup>th</sup> September 2019)**

1. We have had the opportunity to go through the comments submitted by the various stakeholders to the TRAI's Consultation Paper on "Developing a unified numbering plan for fixed line and mobile services" dated 20<sup>th</sup> September 2019.
2. A few service providers, notably, the incumbent operators, i.e., Bharti Airtel Limited (Airtel), Vodafone Idea Limited (VIL), BSNL and MTNL and the Cellular Operators Association of India (COAI) have suggested that Unified Numbering Plan should not be adopted and have put forth certain objections to the same.
3. We are dealing with issue-wise objections and suggestions in the following paragraphs.
  - A. Airtel, VIL and COAI have mentioned that Unified Numbering scheme implementation will be complex, as changes would be required at network level and in regulatory provisions for fixed line interconnection and so on.**
4. We submit that these objections are based out of inertia and the lack of intent on the part of service providers to upgrade the networks in order to benefit the sector and consumers. We submit the changes are not prohibitive and can be carried out easily by all networks including BSNL/MTNL. In fact, the Authority has already analysed the possible changes in the networks of the BSNL/MTNL in its 2010 recommendations itself. We are extracting and reproducing the analysis of the Authority, as provided in its recommendations dated 20.08.2010, as herein below:

2.18

*...The issue of technical feasibility may mainly involve conversion from SDCA based switch architecture to service area based architecture, change of interconnection levels from SDCA to service area based, database modification and routing of calls. None of these problems are intractable....*

2.19

*Regarding the contention of the service providers that they have invested heavily in SDCA based POI infrastructure which would become redundant if numbering system is changed to integrated service area based numbering, one has to look at the situation holistically. Whenever a country's telecom network undergoes a major modification*



*like migration to Next Generation Network or change in switching plan, POIs may have to be rearranged and some of them cannot be immediately reused. In many cases, however, they could be reused for expansion of their own network. One has to look at it as a POI rearrangement that leads to immense simplification and ease of future augmentation.*

5. Further, we are surprised at the submissions, wherein the existing regulatory provisions pertaining to SDCA based POI architecture have been cited as one of the reasons to not implement Unified Numbering Scheme. We submit that these submissions should be completely ignored.
6. We submit that the Authority is already seized of the level of Fixed Interconnection and all these service providers and COAI have already submitted in their response to the concerned Consultation Paper dated 30<sup>th</sup> May 2019 that the SDCA based POI architecture should be completely removed, thereby indicating that they are willing to make network changes for fixed interconnection, thus clearly their reference to the same provisions in this consultation process is nothing but an attempt to divert the focus from main issue.

**B. Another submissions against the Unified Numbering Scheme has been the lack of international experience, as very few countries have adopted this structure.**

7. We submit that this is another invalid submission, as there are very few countries in the world that have faced the level of numbering crunch faced by India. Further the Authority has already dealt with this issue in the consultation paper as well as in its response to the DOT views on 2010 recommendations. We are extracting and reproducing the Authority's response dated 11.05.2012 to DOT's observations on 2010 Recommendations, as herein below for your ready reference:

*(2) (a) It is important to see the reason and merit of the scheme rather than how many countries have done it. We need to see how many countries need it. China, India and USA are three countries with the largest subscriber base in that order. As per ITU statistics the subscriber base as on Dec 2010 for China has 1153.39 million subscribers, India 787.28 million and US 430.07 million. The fourth county Russia is having far less subscribers with a base of 282.61 million. China has implemented 11 digit scheme for mobile, USA has chosen 10 digit integrated numbering scheme as moving to 11 digit is expensive. What does India do? TRAI has already recommended 10 digit scheme and DOT has agreed so it is natural to implement the second part of it i.e. the integrated scheme as a long term solution for scarcity of numbering resources.*



We submit that the above is self-explanatory.

**C. BSNL has mentioned that Unified Numbering Scheme should not be implemented as fixed line numbers have geographical and location significance and Fixed line bill is authentic document for address verification for Government services, thus a distinct fixed line series is required.**

8. We submit that even if BSNL's contentions on geographic and location significance of the Fixed Line numbers be accepted at face-value, it is inexplicable as to how that can only be assured by a dedicated level for BSNL. Nevertheless, we submit that by adopting the solution proposed by RJIL vide its comments to the consultation paper (i.e. by stripping the number "2" which is currently the prefix for all BSNL/MTNL numbers and adding it prior to the STD code), the BSNL number's geographical and locational identity will remain intact. This solution will provide a clear identifier for these numbers and the fixed line numbers are adjusted in a non-disruptive manner under the Unified numbering plan. This will free up the locked inventory and increase the overall number series to 7 billion within the current 10-digit numbering scheme.

9. We further submit that the Fixed Line Bill can continued to be treated as authentic document for address verification etc., as by mere change in numbering scheme the character of the service or bill will not be changed. In view of this we request you to summarily reject such irrational justifications against Unified Numbering Scheme.

**D. The Alternative to the Unified Numbering Scheme suggested by COAI, Airtel and Vodafone is mandating '0' + STD code for accessing fixed line from mobile/ fixed line and Mobile number to be dialled without '0'.**

10. We submit that prefixing of 0 is not a new solution and has been rejected by both the Authority and DoT during the previous consultation process. We submit that this solution will be a pseudo 11 digit numbering for a segment of users and would not be conflict free. In fact, it will cause additional conflicts with respect to international calls as also highlighted by the Authority is its recommendations dated 20<sup>th</sup> August 2010, where the Authority had recommended the dropping of pre-fix 0. We are extracting and reproducing the relevant portion as herein below:

*"2.12 Some of the service providers suggested dropping prefix '0' from inter-service area mobile calls so that levels '7' and '8' can be allocated for mobile numbers without any conflict with the existing codes. The idea being that STD calls to SDCAs having codes starting with '7'*



*and '8' would be dialing with a '0' while mobile to mobile calls would be dialed without a '0' avoiding conflict. This method, however, gives rise to some routing issues both in domestic and international calls. For instance, an incoming call from a Bangalore fixed number 23178696 to a mobile number would be recorded in the mobile in the format (country code)+N(S)N i.e. +918023178696. Now when the recipient uses this stored number to make a call there is a routing deadlock if the number 8023178696 is used for a mobile connection as well. Also all the levels of 7 that have been allotted for fixed numbers cannot be used for mobile. In the case international calls the format used is 00+Country Code+ N(S)N. For example, the mobile number 7126534466 and the fixed number 6534466 of SDCA with code 712 would become same international number 00917126534466 giving rise to conflict in routing."*

11. We submit that the above paragraph is self-explanatory, and the Authority should reject this suggestion completely.

**E. Another suggestion by the service providers is to address the numbering crunch by vacating the sparingly used fixed line levels '3', '5' and '6' for allocation for mobile Services**

12. We submit that this can at best be a temporary solution and would also lead to disruptions for the corporate customers of selective service providers like RJIL, while keeping the unaltered numbering regime for the customers of other service providers like BSNL and Airtel.

13. We submit that evidently, the proposal is self-serving as Airtel has not suggested any disruptions for its own customers on Level 4 despite of very poor utilization ratio.

14. We submit that this solution should also be rejected, and the new rules should be based on the principle of equal treatment to all service providers. We submit that RJIL's submissions on an alternate mode of implementing Unified Numbering Scheme is the best possible solution in this scenario, as all the mobile numbers remain unaffected and all fixed line numbers are treated at same level.

**F. Many operators including Airtel, BSNL, Vodafone and COAI have submitted that the present criteria for assigning mobile numbering series is very stringent but efficient and should be continued with. Another related suggestion is that the underutilized MSC codes may be withdrawn but only if the operator has sufficient numbers for future business plans.**

15. We submit that the current stringent criterion for number allocation was borne out of the number scarcity and as the aim of the current exercise is abundance of MSC codes, there is



no need to continue the stringent criterion when there are sufficient numbers available for allocation.

16. We submit that current criterion is extremely tough on the new service providers who do not have existing large number banks to give sufficient depth for extensive market penetration, therefore the criterion should be simplified.
17. We further submit that the withdrawal of underutilized MSC codes should be based only on objective criteria like the percentage of free numbers for a fixed duration. We feel that there should not be restriction on withdrawal of MSC codes basis the future business needs as that will make it very subjective, if a series is underused, it should be withdrawn.

**G. Another suggestion by BSNL and TTSL is to shift data only numbers to 13 digit numbering.**

18. We strongly oppose this suggestion, as the consumers freely switch free data only usage to voice+data usage basis the plans opted by them, further, the data only users are miniscule and would not help the cause. We also submit that 13 digit numbering be kept exclusively for M2M communications.

**H. RCOM has suggested movement to 11 digit numbering as 13 digit numbering is already implemented for M2M.**

19. We submit that the migration to 11-digit numbering would be disruptive for the entire mobile using population with changes required at multiple levels. Further, this proposal has already been rejected by the Authority and DoT earlier and has not been accepted even in countries like USA due to the associated costs. Therefore, we do not see any merit in this suggestion.
20. In view of the above, we request the Authority to reject all the suggestions against adoption of Unified Numbering Scheme and recommend for immediate adoption of Unified Numbering Scheme and free 6 billion numbers for use. The Authority should recommend for merging the STD codes of the BSNL/MTNL fixed line numbers post stripping the prefix 2 and appending it in front of the STD code to form comprehensive 10 digit numbers. The Fixed line numbers of all other service providers should be subsumed in the levels allocated to the and the Mobile numbers should remain unaltered. Further, post implementing these changes, the criterion of allocating numbers should be simplified and should be based on the operator self-certificate and be done through an automated system.

